

### **REMARKS**

The Remarks are in response to the Office action mailed April 16, 2008. Claims 1-11 remain pending in the application. Applicant appreciates Examiner's thorough search and careful review of the present application.

#### ***Claim Rejections Under 35 U.S.C. 102***

Claims 1-11 were rejected under 35 U.S.C. 102(b) as being anticipated by Wong (U.S. Pat. No. 6,115,690).

Applicant respectfully traverses and requests reconsideration and removal of the rejections and allowance of claims 1-11, for at least the following reasons:

#### **Claims 1-4**

Claim 1 recites in part:

“a product warehousing module for *warehousing products, generating data on the warehoused products, and transmitting the data on the warehoused products to at least one external system.*”

Applicant submits that Wong does not disclose, teach, or otherwise suggest the invention having the above-highlighted features as set forth in claim 1.

Wong discloses that “the present system is based on the concept of virtual inventory. In accordance with the concept of virtual inventory, all of the goods available for purchase in all of the warehouses throughout the world are regarded as available inventory. Because the Web allows business to take place at a light speed [sic], the difference between physical inventory and no physical inventory can be merely the click of a button on a computer screen” (see Wong, col. 24, lines 16-23). Applicant acknowledges that Wong discloses a feature relating to “warehouse”. The “warehouse” in Wong is a noun, which describes *a concept of an entity*. However, the feature relating to “warehousing” provided in claim 1 of the present application is a

verb, which describes *an action of storing products into an entity*. Furthermore, Applicant submits that Wong does not disclose or teach the feature “*generating data on the warehoused products, and transmitting the data on the warehoused products to at least one external system.*”

On page 5 of the current Office action, Examiner asserted that Figure 64 of Wong discloses the above-highlighted features. Applicant respectfully disagrees. Figure 64 of Wong only illustrates a Purchasing view of a purchasing/shipping/receiving/installation (PSRI) screen display. Applicant cannot find any description about the feature of “warehousing products,” or the features of “generating data on the warehoused products, and transmitting the data on the warehoused products to at least one external system.”

Accordingly, Applicant submits that Wong fails to disclose, teach or suggest the feature of “a product warehousing module for *warehousing products, generating data on the warehoused products, and transmitting the data on the warehoused products to at least one external system*”, as recited in claim 1 of the present application.

In addition, claim 1 recites in part:

‘a shipment sheet processing module for *collecting the shipment sheets, generating an accumulative shipment sheet for each client, generating detailed data on the accumulative shipment sheet, and arranging for packing of products to be shipped*’.

Applicant submits that Wong does not disclose, teach, or otherwise suggest the invention having the above-described features as set forth in claim 1.

Page 3 of the current Office action refers to column 33, lines 33-38 of Wong, and this section states: “Referring more particularly to FIG. 84, from a MWS output screen display, the user can select a group of invoices and click on a collections button to cause a collections summary to appear. By further clicking on a By Customer button, the selected invoices are broken down by customer as shown in FIG. 85.” As such, it is understood that Wong can collect a group of invoices and sort the invoices based on different customers. However, the shipment sheet processing module of the present application can collect the shipment sheets (and sort the shipment sheets according to

different clients inherently) and also *accumulate* the shipment sheets relating to each client to *generate an accumulative shipment sheet for each client*.

On page 5 of the current Office action, Examiner asserts that Figure 94 discloses adding multiple invoices. Assuming that the feature “adding multiple invoices” of Wong is equivalent to the feature “collecting the shipment sheets” of claim 1, however, Applicant submits that Wong does not disclose or teach the feature *accumulative shipment sheet for each client* because col. 35, lines 2-10 of Wong states: “prior to entering invoices, the user is prompted as to which type of invoices to be entered, including as one possibility freight bills. When a freight bill is entered, the user enters the invoice number, PO number, and payee (the latter from a pick list), and instead of a vendor list, picks a carrier from a carrier list. The user is then prompted to enter a date range specifying a period to which the freight bill pertains (FIG. 94).”

Accordingly, Applicant submits that Wong fails to disclose, teach or otherwise suggest the feature of “a shipment sheet processing module for *collecting the shipment sheets, generating an accumulative shipment sheet for each client, generating detailed data on the accumulative shipment sheet, and arranging for packing of products to be shipped*”, as recited in claim 1 of the present application.

In conclusion, Wong fails to disclose, teach, or even suggest the present invention having the above-described features as set forth in claim 1. Accordingly, claim 1 is not only novel under 35 U.S.C. §102(b) over Wong, but also unobvious and patentable under 35 U.S.C. §103 over Wong. Reconsideration and removal of the rejection and allowance of claim 1 are requested.

Since claims 2-4 depend from independent claim 1, and respectively recite additional subject matter, claims 2-4 should also be patentable over Wong.

#### **Claims 5-11**

Claim 5 recites in part:

*‘warehousing any one or more of work-in-process products, semi-finished products, finished products, and sales return products;*

...

***Collecting the shipment sheets, generating an accumulative shipment sheet for each client, generating detailed data on the accumulative shipment, and arranging for packing of products to be shipped'.***

For at least reasons similar and corresponding to those asserted above in relation to claim 1, Applicant submits that Wong does not disclose, teach, or even suggest the invention having the above-described features as currently set forth in claim 5. Accordingly, claim 5 is not only novel over Wong under 35 U.S.C. §102(b), but also unobvious and patentable over Wong under 35 U.S.C. §103. Reconsideration and removal of the rejection and allowance of claim 5 are requested.

Since claims 6-11 depend from independent claim 5, and respectively recite additional subject matter, claims 6-11 should also be patentable over Wong.

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### CONCLUSION

In view of the above remarks, the subject application is believed to be in a condition for allowance, and an action to such effect is earnestly solicited. If Examiner believes that there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an Examiner's amendment, please call the undersigned at 714.626.1224.

Respectfully submitted,  
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